



June 24, 2019

Ms. Jennifer Davison
Remedial Project Manager
U.S. Environmental Protection Agency (EPA) Region 5
77 W. Jackson Blvd.
Chicago, Illinois 60604

**Subject: Summary of Vapor Intrusion Investigations
Milford Contaminated Groundwater Site
Milford, Clermont County, Ohio
Remedial Action Contract (RAC) 2
Contract No. EP-S5-06-02
Work Assignment No. 201-RICO-B5SW**

Dear Ms. Davison:

SulTRAC is submitting the Summary of Vapor Intrusion Investigations at the Milford Contaminated Groundwater site in Milford, Ohio. This summary summarizes five sampling events: the Ohio Environmental Protection Agency (OEPA) 2006 and 2007 sampling events, the SulTRAC 2013 monitoring well sampling event, the SulTRAC 2016 Vertical Aquifer Sampling (VAS) event, and the SulTRAC 2016 soil gas sampling event. In addition, this summary assesses vapor intrusion risk based on the findings of these events.

If you have any questions regarding this report, please call me at (312) 201-7711.
Sincerely,

A handwritten signature in dark ink, appearing to read "Karina Kuc".

Karina Kuc
SulTRAC Project Manager

Enclosure

cc: Daniel Olsson, EPA Contracting Officer
Pankaj Parikh, EPA Project Officer
Robie Anson, EPA Remedial Project Manager
Mindy Gould, SulTRAC Program Manager

SUMMARY OF VAPOR INTRUSION INVESTIGATIONS

Under Remedial Action Contract (RAC) No. EP-S5-06-02, Work Assignment No. 201-RICO-B5SW, the U.S. Environmental Protection Agency (EPA) Region 5 tasked SulTRAC to conduct additional Phase II remedial investigation (RI) activities at the Milford Contaminated Groundwater site in Milford, Clermont County, Ohio. In March 2019, as part of the Phase IIB RI, SulTRAC collected soil gas samples on and downgradient of the Baker Feed property.

In addition to presenting the results of the March 2019 soil gas sampling event, this technical memorandum summarizes prior vapor intrusion investigations including (1) results from the Ohio EPA 2006 sub-slab soil gas sampling event near the Baker Feed property, (2) results from the Ohio EPA 2007 soil gas investigation downgradient of the Baker Feed property, (3) results from the SulTRAC 2013 monitoring well sampling event, and (4) results from the SulTRAC 2016 vertical aquifer sampling (VAS) investigation. Each sampling event is summarized below followed by results from the March 2019 soil gas investigation conducted to assess vapor intrusion risks.

Ohio EPA 2006 Sampling Event

In 2006, Ohio EPA collected sub-slab soil gas samples at four locations (SG-1, SG-3, SG-4, and SG-5) near the Baker Feed suspected source area (see Figure 1). As shown in Figure 1, tetrachloroethene (PCE) was detected in one sample (SG-4) at a concentration of 350 parts per billion by volume (ppbv). This concentration is equivalent to 2,374 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). This PCE value was used in EPA's vapor intrusion screening level (VISL) calculator (Version 3.5, May 2019) to estimate the cancer risk and non-cancer hazard posed to residential and commercial indoor air. Inputting a PCE concentration of $2,374 \mu\text{g}/\text{m}^3$ in the VISL calculator results in the following risk levels:

- Residential cancer risk = $6.6\text{E-}06$
- Residential non-cancer hazard quotient = $1.7\text{E+}00$
- Commercial cancer risk = $1.5\text{E-}06$
- Commercial non-cancer hazard quotient = $4.1\text{E-}01$

Ohio EPA 2007 Sampling Event

In 2007, Ohio EPA collected soil gas samples at 13 locations (SG-1 through SG-13) downgradient of the Baker Feed suspected source area (see Figure 2). As shown in Figure 2, PCE was detected in four

samples (SG-1, SG-2, SG-3, and SG-12) with a maximum concentration of 7 ppbv. This concentration is equivalent to $47.5 \mu\text{g}/\text{m}^3$. This PCE value was used in EPA's VISL calculator (Version 3.5, May 2019) to estimate the cancer risk and non-cancer hazard posed to residential and commercial indoor air.

Inputting a PCE concentration of $2,374 \mu\text{g}/\text{m}^3$ in the VISL calculator results in the following risk levels:

- Residential cancer risk = $1.3\text{E}-07$
- Residential non-cancer hazard quotient = $3.4\text{E}-02$
- Commercial cancer risk = $3.0\text{E}-08$
- Commercial non-cancer hazard quotient = $8.1\text{E}-03$

SulTRAC 2013 Monitoring Well Sampling Event

In 2013, SulTRAC collected groundwater samples at seven temporary well locations (TW-06, TW-07, TW-09, TW-11, TW-12, TW-13, and TW-15) and 14 monitoring wells (MW-02, MW-03, MW-05S, MW-05D, MW-10S, MW-10D, MW-11 through MW-14, and MW-17 through MW-20). The temporary wells and monitoring wells were near and downgradient of the Baker Feed suspected source area and also near the COMCO facility (see Figure 3). To assess potential VI from groundwater to indoor air, PCE and trichloroethene (TCE) results were used in EPA's VISL calculator (Version 3.5, May 2019) to estimate the cancer risk and non-cancer hazard posed to residential and commercial indoor air. Results of this evaluation are presented in Table 1. Sampling locations where groundwater concentrations may potentially result in indoor air cancer risks greater than $1\text{E}-06$ and non-cancer hazard quotients greater than 1.0 are shown in red on Figure 3.

SulTRAC 2016 VAS Sampling Event

In 2016, SulTRAC collected groundwater samples at 13 VAS locations (VAS-202 through VAS-210 and VAS-213 through VAS-215), three temporary well locations (TW-01, TW-02, and TW-03), and one monitoring well (MW-15). The VAS locations were downgradient of the Baker Feed suspected source area and the monitoring well was near the suspected source area (see Figure 3). To assess potential VI from groundwater to indoor air, the PCE and TCE results for the shallowest sampling interval at each VAS location were used in EPA's VISL calculator (Version 3.5, May 2019) to estimate the cancer risk and non-cancer hazard posed to residential and commercial indoor air (see Table 1). No groundwater sampling locations were identified where concentrations in the shallowest VAS interval may potentially result in indoor air cancer risks greater than $1\text{E}-06$ and non-cancer hazard quotients greater than 1.0.

SulTRAC 2019 Soil Gas Sampling Event

Based on the four investigations described above and given the magnitude of potential risk/hazards calculated, SulTRAC conducted a vapor intrusion investigation in the area near Baker Feed. A Phase IIB sampling and analysis plan (SAP) addendum was prepared and approved by EPA. The SAP addendum described the vapor intrusion investigation to be conducted. The investigation called for a phased approach. The first phase consisted of collecting soil gas samples at two intervals (8-10 feet bgs and 5 feet above the groundwater table) at up to 15 locations. The second phase included a contingency for collecting sub-slab and indoor air samples based on results of the soil gas investigation.

In March 2019, SulTRAC collected soil gas samples from six locations in the Baker Feed area and from three locations downgradient of the Baker Feed area. For the three downgradient locations, samples were collected from the shallow and deeper interval as planned. For the Baker Feed locations, soil gas could not be collected from any of the deeper intervals and several of the shallow intervals due to lack of soil gas as a result of swelling clay in the area. Additionally, in order to collect the sample, the shallow interval depth had to be adjusted from 8-10 feet bgs to 5 feet bgs. Helium, used as a tracer gas, was detected in samples SG-05-05-032719, RI-IIB-SG-06-05-032719, RI-IIB-SG-07-05-032719. These samples are located on the eastern portion of the Baker Feed property. The remaining three samples collected on the western portion of the Baker Feed property did not have any helium detections. Figure 4 shows the locations of soil gas samples collected during the March 2019 sampling event.

Soil gas results were reviewed to assess whether site-related chemicals (chemicals already detected in groundwater) were potentially migrating to indoor air through the vapor intrusion pathway. PCE was detected in four soil gas samples and TCE was detected in two soil gas samples. However, none of the detections exceeded the residential soil gas VISL of $1,390 \mu\text{g}/\text{m}^3$ for PCE or $69.5 \mu\text{g}/\text{m}^3$ for TCE. Soil gas sample results are presented in Table 2. PCE and TCE detections are shown on Figure 4.

Conclusions

Ohio EPA sub-slab and soil gas sampling results indicate that vapor intrusion may potentially be an issue at one location (SG-4). SG-4 is located within the Baker Feed suspected source area. SulTRAC groundwater sampling results indicate that vapor intrusion may potentially be an issue at eight locations (MW-11, MW-12, MW-14, MW-17, MW-18, MW-20, TW-03, and TW-09). All of these locations except MW-12 are also in the Baker Feed suspected source area. MW-12 is located downgradient of Baker Feed near VAS transect B.

Based on the evaluation of Ohio EPA soil gas sampling and Phase I and II RI groundwater results, SulTRAC collected soil gas samples from Baker Feed and downgradient of Baker Feed to assess the vapor intrusion pathway. Sample results did not exceed VISLs and therefore, do not indicate that vapor intrusion is a problem either on or downgradient of the Baker Feed property. Based on the soil gas results, PCE and TCE concentrations in groundwater, the depth to groundwater at the site, and the tight clays present in the vadose zone, additional vapor intrusion sampling (sub-slab and indoor air) does not appear to be necessary.

FIGURES

(Four Pages)

1 – OEPA September 2006 Sub-Slab Soil Gas and Ground Water Investigation Results

2 – OEPA March 2007 Soil Gas PCE Concentrations

3 – SulTRAC Groundwater to Indoor Air Vapor Intrusion Screening Results

4 – SulTRAC March 2019 Soil Gas Sample Locations and Results



Prepared by J.R. Watterworth
December 21, 2006

Figure 1
Milford Well Field
September 2006 Sub-Slab Soil Gas and Ground Water Investigation Results



Legend

-  Ohio EPA Monitoring Well Locations
- 1150** PCE Concentrations in Ground Water (ug/l)
- SG1** Sub-Slab Soil Gas Sample Locations
- 350** PCE Sub-Slab Soil Gas Cocentrations (ppbv)



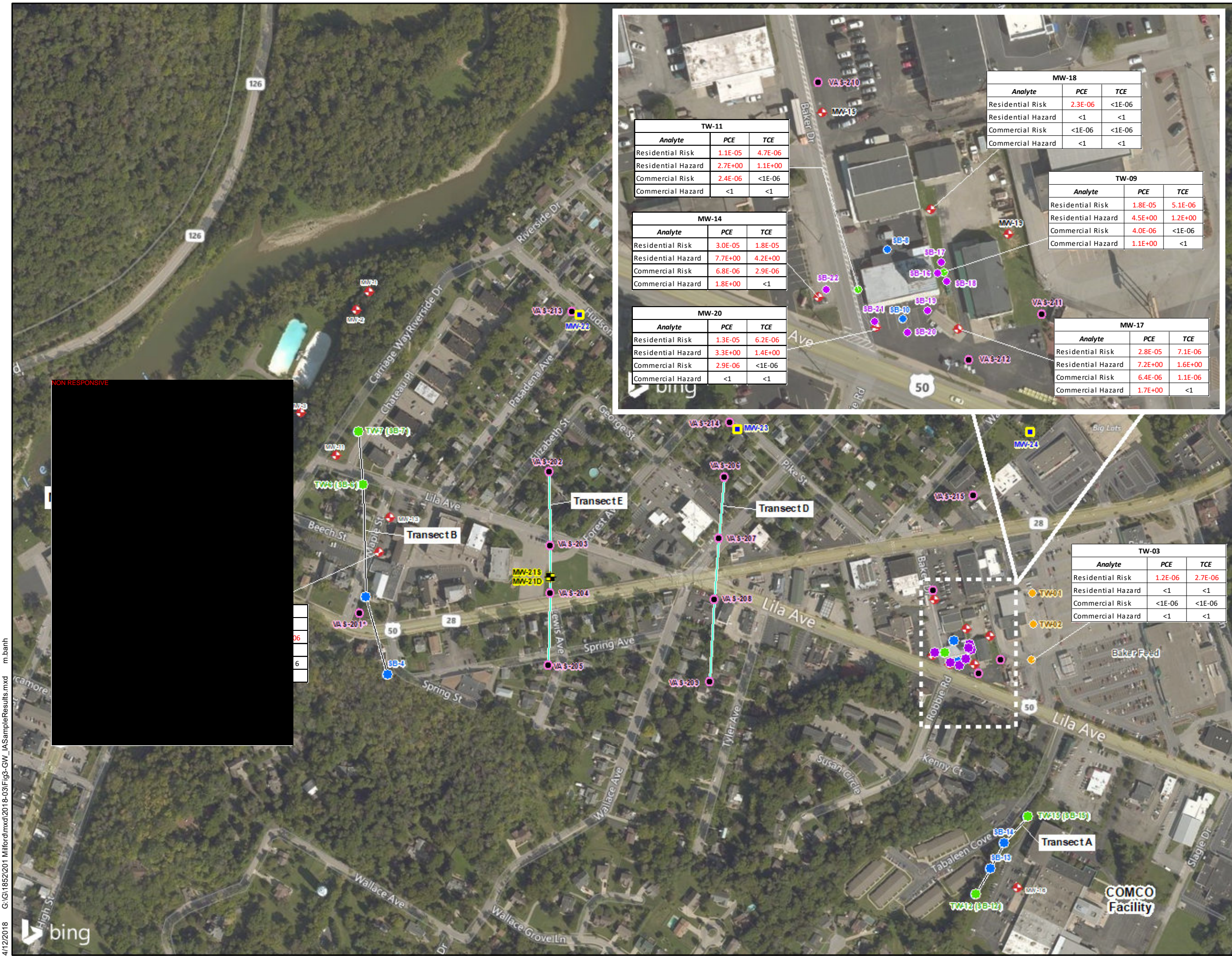
Figure 2
Milford Well Field
March 2007 Soil Gas PCE Concentrations



Legend

- Phase I Soil Gas Locations
- 7 PCE Concentration in ppbv
- ND Non-detect





**MILFORD CONTAMINATED AQUIFER SITE
MILFORD, CLERMONT COUNTY, OHIO**

**FIGURE 3
GROUNDWATER TO INDOOR AIR VAPOR
INTRUSION SCREENING RESULTS**

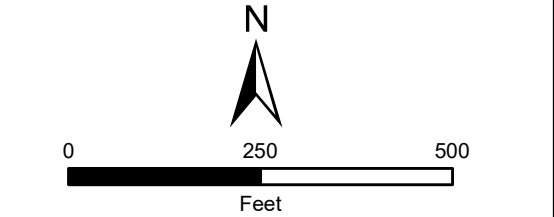
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Legend

● Soil Gas Sample Location

µg/m³ = micrograms per cubic meter
PCE = tetrachloroethene
TCE = trichloroethene
VISL = Vapor Intrusion Screening Level
Residential VISL for PCE = 1,390 µg/m³
Residential VISL for TCE = 69.5 µg/m³
Only detections are shown on the map
All results are presented in µg/m³



MILFORD CONTAMINATED AQUIFER SITE
MILFORD, CLERMONT COUNTY, OHIO

FIGURE 4
March 2019 Soil Gas Sample
Locations and Results



Tables

(Seven Pages)

1 – Groundwater to Indoor Air VISL Evaluation

2 – Soil Gas Analytical Results Summary

TABLE 1
MILFORD CONTAMINATED AQUIFER SITE
GROUNDWATER TO INDOOR AIR VISL EVALUATION

| Monitoring or Temporary Well | DTW (feet bgs) | PCE Result | TCE Result | GW Temperature | VISL Residential Cancer Risk/Hazard Quotient | | VISL Commercial Cancer Risk/Hazard Quotient | |
|------------------------------------|-------------------|------------|------------|-------------------|---|--------------------|--|--------------------|
| | | | | | PCE | TCE | PCE | TCE |
| Phase II TW | | | | | | | | |
| TW-01 | 48.03 | 0.5U | 0.5U | 10.1 | NA | NA | NA | NA |
| TW-02 | 46.9 | 0.63 | 0.5U | 10.6 | 1.96E-08/5.07E-03 | NA | 4.48E-09/1.21E-03 | NA |
| TW-03 | 46.4 | 36 | 5.9 | 13.2 | 1.30E-06/3.35E-01 | 2.90E-06/6.64E-01 | 2.97E-07/7.98E-02 | 4.63E-07/1.58E-01 |
| Phase I TW | | | | | | | | |
| TW-06 | 61.49 | 5.0U | 5.0U | 7.4 | NA | NA | NA | NA |
| TW-07 | 57.88 | 5.0U | 5.0U | 12.0 | NA | NA | NA | NA |
| TW-09 | 38.12 | 720D | 15 | 7.5 | 1.87E-05/4.84E+00 | 5.54E-06/1.27E+00 | 4.28E-06/1.15E+00 | 8.87E-07/3.03E-01 |
| TW-11 | 48.5 | 410D | 13 | 8.4 | 1.12E-05/2.91E+00 | 5.03E-06/1.15E+00 | 2.57E-06/6.92E-01 | 8.04E-07/2.75E-01 |
| TW-12 | 30.65 | 5.0U | 5.0U | 8.2 | NA | NA | NA | NA |
| TW-13 | 30.7 | 5.0U | 5.0U | 9.5 | NA | NA | NA | NA |
| TW-15 | 47.06 | 5.0J | 5.0U | 16.0 | 2.10E-07/5.43E-02 | NA | NA | NA |
| Monitoring Wells | | | | | | | | |
| MW-2 | 16.56 | 5.0U | 5.0U | 14.8 | NA | NA | NA | NA |
| MW-3 | 19.43 | 5.0U | 5.0U | 15.3 | NA | NA | NA | NA |
| MW-5S | 25.5 | 5.0U | 5.0U | 14.9 | NA | NA | NA | NA |
| MW-5D | 27.64 | 2.8J | 0.83J | 13.7 | 1.04E-07/2.68E-02 | 4.17E-07/9.57E-02 | NA | NA |
| MW-10S | 20.35 | 1.3J | 5.0U | 16.0 | 5.45E-08/1.41E-02 | NA | NA | NA |
| MW-10D | 20.24 | 6.7 | 0.97J | 15.0 | 2.66E-07/6.89E-02 | 5.19E-07/1.19E-01 | NA | NA |
| MW-12 | 63.65 | 19 | 2.6J | 14.4 | 7.31E-07/1.89E-01 | 1.35E-06/3.10E-01 | 1.67E-07/4.50E-02 | 2.16E-07/7.38E-02 |
| MW-13 | 65.09 | 5.0J | 0.43J | 14.4 | 1.92E-07/4.98E-02 | 2.24E-07/ 5.13E-02 | NA | NA |
| MW-14 | 55.13 | 760D | 35 | 15.3 | 3.07E-05/7.95E+00 | 1.90E-05/4.36E+00 | 7.03E-06/1.89E+00 | 3.04E-06 /1.04E+00 |
| MW-17 | 44.02 | 680D | 13 | 16.1 | 2.87E-05/7.43E+00 | 7.33E-06/1.68E+00 | 6.57E-06/1.77E+00 | 1.17E-06/4.00E-01 |
| MW-18 | 45.32 | 57 | 0.6J | 15.6 | 2.34E-06/6.06E-01 | 3.30E-07/7.58E-02 | 5.36E-07/1.44E-01 | 5.28E-08/1.80E-02 |
| MW-19 | 45.3 | 18 | 0.45J | 14.9 | 7.11E-07/1.84E-01 | 2.40E-07 /5.50E-02 | NA | NA |
| MW-20 | 45.31 | 390D | 14 | 12.2 | 1.33E-05/3.44E+00 | 6.55E-06 /1.50E+00 | 3.04E-06/8.18E-01 | 1.05E-06/ 3.57E-01 |
| Phase II VAS Summary* | | | | | | | | |
| 202 | 65 | 1.0U | 1.0U | 18.0 | NA | NA | NA | NA |
| 203 | 66 | 1.0U | 1.0U | 14.6 | NA | NA | NA | NA |
| 203/204 | 64.2 | 12 | 1.0U | 14.3 | 4.59E-07/1.19E-01 | NA | NA | NA |
| 204 | 65 | 11 | 0.93J | 14.0 | 4.14E-07 /1.07E-01 | 4.74E-07/1.09E-01 | NA | NA |
| 205 | 33.59 | 1.0U | 1.0U | 14.4 | NA | NA | NA | NA |
| 213 | 65 | 1.0U | 1.0U | 16.6 | NA | NA | NA | NA |
| 206 | 62 | 1.8 | 1.0U | 17.1 | 8.01E-08/2.07E-02 | NA | NA | NA |
| 207 | 62.8 | 2.8 | 1.0U | 16.0 | 1.17E-07/3.04E-02 | NA | NA | NA |
| 208 | 46 | 1.0U | 1.0U | 15.9 | NA | NA | NA | NA |
| 209 | 21.5 | 1.0U | 1.0U | NA | NA | NA | NA | NA |
| 214 | 62 | 1.0U | 1.0U | 17.4 | NA | NA | NA | NA |
| 210 | 48.26 | 8.1 | 1.0U | 15.2 | 3.25E-07/8.42E-02 | NA | NA | NA |
| 211 | 44 | 1.0U | 1.0U | NA | NA | NA | NA | NA |
| 215 | 50 | 1.0U | 1.0U | NA | NA | NA | NA | NA |
| MW-15 | | 14 | 1.0U | 20.3 | 7.38E-07/1.91E-01 | NA | NA | NA |

Notes:

*PCE and TCE results from the shallowest interval were used

Values in red indicate a calculated vapor intrusion risk greater than 1E-06 or hazard quotient greater than 1

Well-specific groundwater temperature was used in VISL calculator

bgs = below ground surface

DTW = Depth to Water

NA = Not applicable

PCE = tetrachloroethene

TCE = trichloroethene

U = analyte was not detected

VAS = Vertical Aquifer Sample

VISL = vapor intrusion screening level

TABLE 2
MILFORD CONTAMINATED AQUIFER SITE
SOIL GAS ANALYTICAL RESULTS SUMMARY

| Analyte | EPA VISL (Residential Soil Gas) (ug/m ³) | RI-IIB-SG-01- 10-032619 | | RI-IIB-SG-01- 20-032619 | | RI-IIB-SG-02- 10-032619 | | RI-IIB-SG-02- 56-032619 | | RI-IIB-SG-03- 10-032619 | | RI-IIB-SG-03- 10-032619-A | | RI-IIB-SG-03- 43-032619 | |
|--------------------------------|--|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|------------------------------|-----------|----------------------------|-----------|
| | | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier |
| TO-15 (ug/m ³) | | | | | | | | | | | | | | | |
| 1,1,1-Trichloroethane | 174000 | 2 | U | 171 | | 2 | U | 5 | | 2.1 | U | 2.1 | U | 574 | |
| 1,1,2,2-Tetrachloroethane | 16.1 | 1.3 | U | 2.1 | U | 1.3 | U | 1.3 | U | 1.3 | U | 1.3 | U | 1.3 | U |
| 1,1,2-Trichloroethane | 6.95 | 1 | U | 1.7 | U | 1 | U | 1 | U | 1 | U | 1 | U | 1.1 | U |
| 1,1,2-Trichlorotrifluoroethane | 174000 | 2.9 | U | 4.7 | U | 2.9 | U | 2.9 | U | 2.9 | U | 2.9 | U | 4.9 | |
| 1,1-Dichloroethane | 585 | 1.5 | U | 2.5 | U | 1.5 | U | 1.5 | U | 1.5 | U | 1.5 | U | 1.6 | U |
| 1,1-Dichloroethene | 6950 | 1.5 | U | 2.4 | U | 1.5 | U | 1.5 | U | 1.5 | U | 1.5 | U | 1.5 | U |
| 1,2,4-Trichlorobenzene | 69.5 | 13.8 | U | 22.7 | U | 13.8 | U | 14.1 | U | 14.1 | U | 14.1 | U | 14.3 | U |
| 1,2,4-Trimethylbenzene | 2090 | 16.2 | | 11.2 | | 8.2 | | 6.4 | | 9.2 | J | 1.9 | J | 12.6 | |
| 1,2-Dibromoethane (EDB) | 1.56 | 1.4 | U | 2.4 | U | 1.4 | U | 1.5 | U | 1.5 | U | 1.5 | U | 1.5 | U |
| 1,2-Dichlorobenzene | 6950 | 2.2 | U | 3.7 | U | 2.2 | U | 2.3 | U | 2.3 | U | 2.3 | U | 2.3 | U |
| 1,2-Dichloroethane | 36 | 0.75 | U | 1.2 | U | 0.75 | U | 0.77 | U | 0.77 | U | 0.77 | U | 0.78 | U |
| 1,2-Dichloropropane | 139 | 1.7 | U | 2.8 | U | 1.7 | U | 1.8 | U | 1.8 | U | 1.8 | U | 1.8 | U |
| 1,3,5-Trimethylbenzene | 2090 | 4.8 | U | 3.2 | | 2.7 | U | 2.9 | U | 4.7 | U | 1.9 | U | 4.5 | U |
| 1,3-Butadiene | 31.2 | 0.82 | U | 1.4 | U | 0.82 | U | 0.84 | U | 0.84 | U | 0.84 | U | 0.86 | U |
| 1,3-Dichlorobenzene | NA | 2.2 | U | 3.7 | U | 2.2 | U | 2.3 | U | 2.6 | | 2.3 | U | 2.3 | U |
| 1,4-Dichlorobenzene | 85.1 | 5.6 | U | 9.2 | U | 5.6 | U | 5.7 | U | 5.7 | U | 5.7 | U | 5.8 | U |
| 1,4-Dioxane (p-Dioxane) | 187 | 6.7 | U | 11 | U | 6.7 | U | 6.8 | U | 6.8 | U | 6.8 | U | 7 | U |
| 2,2,4-Trimethylpentane | NA | 4.3 | U | 7.1 | U | 4.3 | U | 4.4 | U | 4.4 | U | 0.49 | U | 4.9 | U |
| 2-Butanone (MEK) | 174000 | 6.1 | | 24.5 | U | 9.2 | | 23.5 | | 9.9 | U | 7 | U | 28.7 | |
| 2-Hexanone | 1040 | 7.6 | U | 12.5 | U | 7.6 | U | 7.8 | U | 7.8 | U | 7.8 | U | 7.9 | U |
| 2-Propanol | 6950 | 19.4 | | 7.5 | U | 5 | | 46.3 | | 4.7 | U | 4.7 | U | 27.9 | |
| 4-Ethyltoluene | NA | 4.6 | U | 7.5 | U | 4.6 | U | 4.7 | U | 4.7 | U | 4.7 | U | 4.8 | U |
| 4-Methyl-2-pentanone (MIBK) | 104000 | 7.6 | U | 12.5 | U | 7.6 | U | 7.8 | U | 7.8 | U | 7.8 | U | 7.9 | U |
| Acetone | 1070000 | 44 | | 104 | | 40.5 | | 126 | | 41.7 | J | 29.9 | J | 155 | |
| Allyl chloride | 34.8 | 2.9 | U | 4.8 | U | 2.9 | U | 3 | U | 3 | U | 3 | U | 3 | U |
| Benzene | 120 | 6.9 | | 24.9 | | 9.7 | | 31 | | 19.3 | J | 6.9 | J | 37.8 | |
| Benzyl chloride | 19.1 | 4.8 | U | 7.9 | U | 4.8 | U | 4.9 | U | 4.9 | U | 4.9 | U | 5 | U |
| Bromodichloromethane | 25.3 | 2.5 | U | 4.1 | U | 2.5 | U | 2.5 | U | 2.5 | U | 2.5 | U | 2.6 | U |

TABLE 2
MILFORD CONTAMINATED AQUIFER SITE
SOIL GAS ANALYTICAL RESULTS SUMMARY

| Analyte | EPA VISL (Residential Soil Gas) (ug/m ³) | RI-IIB-SG-01- 10-032619 | | RI-IIB-SG-01- 20-032619 | | RI-IIB-SG-02- 10-032619 | | RI-IIB-SG-02- 56-032619 | | RI-IIB-SG-03- 10-032619 | | RI-IIB-SG-03- 10-032619-A | | RI-IIB-SG-03- 43-032619 | |
|---------------------------|--|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|------------------------------|-----------|----------------------------|-----------|
| | | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier |
| Bromoform | 851 | 9.6 | U | 15.8 | U | 9.6 | U | 9.8 | U | 9.8 | U | 9.8 | U | 10 | U |
| Bromomethane | 174 | 1.4 | U | 2.4 | U | 1.4 | U | 1.5 | U | 1.5 | U | 1.5 | U | 1.5 | U |
| Carbon disulfide | 24300 | 1.2 | U | 1.9 | | 1.2 | U | 2.6 | | 2 | | 1.2 | U | 2.9 | |
| Carbon tetrachloride | 156 | 2.3 | U | 3.9 | U | 2.3 | U | 2.4 | U | 2.4 | U | 2.4 | U | 2.4 | U |
| Chlorobenzene | 1740 | 1.7 | U | 2.8 | U | 1.7 | U | 1.8 | U | 1.8 | U | 1.8 | U | 1.8 | U |
| Chloroethane | 348000 | 0.98 | U | 1.6 | U | 0.98 | U | 1 | U | 1 | U | 1 | U | 1 | U |
| Chloroform | 40.7 | 0.91 | U | 1.5 | U | 0.91 | U | 0.93 | U | 0.93 | U | 0.93 | U | 0.94 | U |
| Chloromethane | 3130 | 1.6 | U | 1.3 | U | 0.77 | U | 3.8 | U | 0.79 | U | 0.79 | U | 1.4 | |
| cis-1,2-Dichloroethene | NA | 1.5 | U | 2.4 | U | 1.5 | U | 1.5 | U | 1.5 | U | 1.5 | U | 1.5 | U |
| cis-1,3-Dichloropropene | NA | 1.7 | U | 2.8 | U | 1.7 | U | 1.7 | U | 1.7 | U | 1.7 | U | 1.8 | U |
| Cyclohexane | 209000 | 21.5 | U | 49.7 | U | 20.5 | U | 42.3 | U | 48.1 | U | 20.9 | U | 59.7 | U |
| Dibromochloromethane | NA | 3.2 | UJ | 5.2 | U | 3.2 | UJ | 3.2 | UJ | 3.2 | UJ | 3.2 | UJ | 3.3 | UJ |
| Dichlorodifluoromethane | 3480 | 2.3 | | 3 | U | 2.1 | | 3.6 | | 2.4 | | 2.3 | | 18.8 | |
| Dichlorotetrafluoroethane | NA | 2.6 | U | 4.3 | U | 2.6 | U | 2.7 | U | 2.7 | U | 2.7 | U | 2.7 | U |
| Ethanol | NA | 57.4 | | 23.1 | | 25 | | 54.9 | | 26.4 | J | 9.6 | J | 490 | |
| Ethylbenzene | 374 | 16.5 | | 16.3 | | 9.7 | | 10.3 | | 14.6 | J | 4.1 | J | 26.9 | |
| Hexachloro-1,3-butadiene | 42.5 | 9.9 | U | 16.3 | U | 9.9 | U | 10.1 | U | 10.1 | U | 10.1 | U | 10.3 | U |
| Isopropylbenzene (Cumene) | 13900 | 4.6 | U | 7.5 | U | 4.6 | U | 4.7 | U | 4.7 | U | 4.7 | U | 4.8 | U |
| m&p-Xylene | 3480 | 34.5 | | 28.9 | | 16.9 | | 15.9 | | 21.3 | J | 6 | J | 37.5 | |
| Methylene Chloride | 20900 | 56.1 | U | 14.7 | | 12.7 | U | 34.9 | U | 33.9 | U | 31.3 | U | 51.3 | U |
| Methyl-tert-butyl ether | 3600 | 6.7 | U | 11 | U | 6.7 | U | 6.8 | U | 6.8 | U | 6.8 | U | 7 | U |
| n-Heptane | 13900 | 45.8 | | 67.9 | | 27.1 | | 69.5 | | 61.7 | J | 19.3 | J | 45.9 | |
| n-Hexane | 24300 | 42.6 | U | 112 | U | 43.4 | | 119 | U | 108 | J | 40.2 | UJ | 84.4 | U |
| n-Propylbenzene | 3480 | 4.6 | U | 7.5 | U | 4.6 | U | 4.7 | U | 4.7 | U | 4.7 | U | 4.8 | U |
| o-Xylene | 34800 | 13 | | 10.5 | | 6.8 | | 5.7 | | 8.4 | J | 2.4 | J | 15.5 | U |
| Styrene | 34800 | 1.6 | UJ | 2.6 | U | 1.6 | UJ | 1.6 | UJ | 1.6 | UJ | 1.6 | UJ | 1.6 | UJ |
| Tetrachloroethene | 1390 | 1.3 | U | 20.1 | | 1.3 | U | 1.6 | | 2.6 | | 1.3 | U | 1140 | |
| Tetrahydrofuran | 69500 | 1.1 | U | 1.8 | U | 1.1 | U | 1.1 | U | 1.1 | U | 1.1 | U | 1.1 | U |
| Toluene | 174000 | 37.7 | | 56.4 | | 27 | | 84.1 | | 46.4 | J | 16.6 | J | 78.4 | |

TABLE 2
MILFORD CONTAMINATED AQUIFER SITE
SOIL GAS ANALYTICAL RESULTS SUMMARY

| Analyte | EPA VISL (Residential Soil Gas) (ug/m ³) | RI-IIB-SG-01- 10-032619 | | RI-IIB-SG-01- 20-032619 | | RI-IIB-SG-02- 10-032619 | | RI-IIB-SG-02- 56-032619 | | RI-IIB-SG-03- 10-032619 | | RI-IIB-SG-03- 10-032619-A | | RI-IIB-SG-03- 43-032619 | |
|--|--|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|------------------------------|-----------|----------------------------|-----------|
| | | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier |
| trans-1,2-Dichloroethene | NA | 1.5 | U | 2.4 | U | 1.5 | U | 1.5 | U | 1.5 | U | 1.5 | U | 1.5 | U |
| trans-1,3-Dichloropropene | NA | 1.7 | U | 2.8 | U | 1.7 | U | 1.7 | U | 1.7 | U | 1.7 | U | 1.8 | U |
| Trichloroethene | 69.5 | 1 | U | 1.6 | U | 1 | U | 1.4 | | 1 | U | 1 | U | 13.8 | |
| Trichlorofluoromethane | NA | 2.1 | U | 3.4 | U | 2.1 | U | 2.1 | U | 2.1 | U | 2.1 | U | 6.9 | |
| Vinyl chloride | 55.9 | 0.48 | U | 0.78 | U | 0.48 | U | 0.49 | U | 0.49 | U | 0.49 | U | 0.49 | U |
| Other (ug/m³ unless otherwise noted) | | | | | | | | | | | | | | | |
| Helium | NA | 3.6 | U | 3.6 | U | 3.6 | U | 3.6 | U | 3.6 | U | 3.6 | U | 3.6 | U |

TABLE 2
MILFORD CONTAMINATED AQUIFER SITE
SOIL GAS ANALYTICAL RESULTS SUMMARY

| Analyte | EPA VISL (Residential Soil Gas) (ug/m ³) | RI-IIB-SG-04- 05-032719 | | RI-IIB-SG-05- 05-032719 | | RI-IIB-SG-06- 05-032719 | | RI-IIB-SG-07- 05-032719 | | RI-IIB-SG-08- 05-032719 | | RI-IIB-SG-09- 05-032719 | | RI-IIB-SG-09- 05-032719-A | |
|--------------------------------|--|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|------------------------------|-----------|
| | | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier |
| TO-15 (ug/m ³) | | | | | | | | | | | | | | | |
| 1,1,1-Trichloroethane | 174000 | 2 | U | 2.2 | R | 2.2 | R | 2.1 | R | 2 | U | 2.2 | U | 2.2 | U |
| 1,1,2,2-Tetrachloroethane | 16.1 | 1.3 | U | 1.4 | R | 1.4 | R | 1.3 | R | 1.3 | U | 1.4 | U | 1.4 | U |
| 1,1,2-Trichloroethane | 6.95 | 1 | U | 1.1 | R | 1.1 | R | 1.1 | R | 1 | U | 1.1 | U | 1.1 | U |
| 1,1,2-Trichlorotrifluoroethane | 174000 | 2.9 | U | 3 | R | 3 | R | 3 | R | 2.9 | U | 3 | U | 3.1 | U |
| 1,1-Dichloroethane | 585 | 1.5 | U | 1.6 | R | 1.6 | R | 1.6 | R | 1.5 | U | 1.6 | U | 1.6 | U |
| 1,1-Dichloroethene | 6950 | 1.5 | U | 1.6 | R | 1.6 | R | 1.5 | R | 1.5 | U | 1.6 | U | 1.6 | U |
| 1,2,4-Trichlorobenzene | 69.5 | 13.8 | U | 14.6 | R | 14.6 | R | 14.3 | R | 13.8 | U | 14.6 | U | 14.9 | U |
| 1,2,4-Trimethylbenzene | 2090 | 9.9 | | 38.9 | R | 22 | R | 22.5 | R | 24.5 | | 4.4 | J | 2.7 | J |
| 1,2-Dibromoethane (EDB) | 1.56 | 1.4 | U | 1.5 | R | 1.5 | R | 1.5 | R | 1.4 | U | 1.5 | U | 1.5 | U |
| 1,2-Dichlorobenzene | 6950 | 2.2 | U | 2.4 | R | 2.4 | R | 2.3 | R | 2.2 | U | 2.4 | U | 2.4 | U |
| 1,2-Dichloroethane | 36 | 0.75 | U | 0.8 | R | 0.8 | R | 0.78 | R | 0.75 | U | 0.8 | U | 0.81 | U |
| 1,2-Dichloropropane | 139 | 1.7 | U | 1.8 | R | 1.8 | R | 1.8 | R | 1.7 | U | 1.8 | U | 1.9 | U |
| 1,3,5-Trimethylbenzene | 2090 | 2.5 | U | 11.4 | R | 7.6 | R | 6.4 | R | 8 | U | 1.9 | U | 2 | U |
| 1,3-Butadiene | 31.2 | 0.82 | U | 0.87 | R | 0.87 | R | 0.86 | R | 0.82 | U | 0.87 | U | 0.89 | U |
| 1,3-Dichlorobenzene | NA | 2.2 | U | 2.4 | R | 2.4 | R | 2.9 | R | 2.2 | U | 3.1 | | 2.5 | |
| 1,4-Dichlorobenzene | 85.1 | 5.6 | U | 5.9 | R | 5.9 | R | 5.8 | R | 5.6 | U | 5.9 | U | 6.1 | U |
| 1,4-Dioxane (p-Dioxane) | 187 | 6.7 | U | 7.1 | R | 7.1 | R | 7 | R | 6.7 | U | 7.1 | U | 7.2 | U |
| 2,2,4-Trimethylpentane | NA | 4.3 | U | 4.6 | R | 4.6 | R | 4.5 | R | 4.3 | U | 4.6 | U | 4.7 | U |
| 2-Butanone (MEK) | 174000 | 83.1 | | 11.4 | R | 30.3 | R | 13.6 | R | 10.2 | | 5.8 | U | 5.9 | U |
| 2-Hexanone | 1040 | 7.6 | U | 8.1 | R | 8.1 | R | 7.9 | R | 7.6 | U | 8.1 | U | 8.2 | U |
| 2-Propanol | 6950 | 10.3 | | 4.8 | R | 16.1 | R | 4.8 | R | 4.6 | U | 4.8 | U | 8.1 | |
| 4-Ethyltoluene | NA | 4.6 | U | 11.8 | R | 8.1 | R | 6.3 | R | 5.5 | U | 4.8 | U | 5 | U |
| 4-Methyl-2-pentanone (MIBK) | 104000 | 7.6 | U | 8.1 | R | 8.1 | R | 7.9 | R | 7.6 | U | 8.1 | U | 8.2 | U |
| Acetone | 1070000 | 98 | | 183 | R | 162 | R | 117 | R | 38.6 | | 21.6 | | 24.3 | |
| Allyl chloride | 34.8 | 2.9 | U | 3.1 | R | 3.1 | R | 3 | R | 2.9 | U | 3.1 | U | 3.1 | U |
| Benzene | 120 | 1.9 | | 2.3 | R | 2.2 | R | 1.9 | R | 22.1 | | 3.1 | | 2.9 | |
| Benzyl chloride | 19.1 | 4.8 | U | 5.1 | R | 5.1 | R | 5 | R | 4.8 | U | 5.1 | U | 5.2 | U |
| Bromodichloromethane | 25.3 | 2.5 | U | 2.6 | R | 2.6 | R | 2.6 | R | 2.5 | U | 2.6 | U | 2.7 | U |

TABLE 2
MILFORD CONTAMINATED AQUIFER SITE
SOIL GAS ANALYTICAL RESULTS SUMMARY

| Analyte | EPA VISL (Residential Soil Gas) (ug/m ³) | RI-IIB-SG-04- 05-032719 | | RI-IIB-SG-05- 05-032719 | | RI-IIB-SG-06- 05-032719 | | RI-IIB-SG-07- 05-032719 | | RI-IIB-SG-08- 05-032719 | | RI-IIB-SG-09- 05-032719 | | RI-IIB-SG-09- 05-032719-A | |
|---------------------------|--|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|------------------------------|-----------|
| | | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier |
| Bromoform | 851 | 9.6 | U | 10.2 | R | 10.2 | R | 10 | R | 9.6 | U | 10.2 | U | 10.4 | U |
| Bromomethane | 174 | 1.4 | U | 1.5 | R | 1.5 | R | 1.5 | R | 1.4 | U | 1.5 | U | 1.6 | U |
| Carbon disulfide | 24300 | 60.7 | | 1.2 | R | 9.7 | R | 2.4 | R | 3.5 | | 1.2 | U | 1.3 | U |
| Carbon tetrachloride | 156 | 2.3 | U | 2.5 | R | 2.5 | R | 2.4 | R | 2.3 | U | 2.5 | U | 2.5 | U |
| Chlorobenzene | 1740 | 1.7 | U | 1.8 | R | 1.8 | R | 1.8 | R | 1.7 | U | 1.8 | U | 1.9 | U |
| Chloroethane | 348000 | 0.98 | U | 1 | R | 1 | R | 1 | R | 0.98 | U | 1 | U | 1.1 | U |
| Chloroform | 40.7 | 0.91 | U | 0.96 | R | 0.96 | R | 0.94 | R | 0.91 | U | 0.96 | U | 0.98 | U |
| Chloromethane | 3130 | 1.5 | | 0.96 | R | 4.6 | R | 2.3 | R | 0.77 | U | 1.3 | U | 1.6 | U |
| cis-1,2-Dichloroethene | NA | 1.6 | | 1.6 | R | 1.6 | R | 1.5 | R | 1.5 | U | 1.6 | U | 1.6 | U |
| cis-1,3-Dichloropropene | NA | 1.7 | U | 1.8 | R | 1.8 | R | 1.8 | R | 1.7 | U | 1.8 | U | 1.8 | U |
| Cyclohexane | 209000 | 4.6 | U | 3.4 | R | 3.4 | R | 3.3 | R | 41.4 | U | 9 | U | 4.4 | U |
| Dibromochloromethane | NA | 3.2 | UJ | 3.4 | R | 3.4 | R | 3.3 | R | 3.2 | UJ | 3.4 | UJ | 3.4 | UJ |
| Dichlorodifluoromethane | 3480 | 2.1 | | 2 | R | 2 | R | 1.9 | R | 1.8 | U | 2 | U | 2 | U |
| Dichlorotetrafluoroethane | NA | 2.6 | U | 2.8 | R | 2.8 | R | 2.7 | R | 2.6 | U | 2.8 | U | 2.8 | U |
| Ethanol | NA | 80.2 | | 23.9 | R | 31.1 | R | 22.1 | R | 5 | | 13.1 | J | 9.2 | J |
| Ethylbenzene | 374 | 3.7 | | 3.1 | R | 3.2 | R | 2.2 | R | 35.9 | | 1.7 | U | 1.7 | U |
| Hexachloro-1,3-butadiene | 42.5 | 9.9 | U | 10.5 | R | 10.5 | R | 10.3 | R | 9.9 | U | 10.5 | U | 10.7 | U |
| Isopropylbenzene (Cumene) | 13900 | 4.6 | U | 4.8 | R | 4.8 | R | 4.8 | R | 4.6 | U | 4.8 | U | 5 | U |
| m&p-Xylene | 3480 | 13.5 | | 13.3 | R | 13.1 | R | 8.2 | R | 45.7 | | 3.4 | U | 3.5 | U |
| Methylene Chloride | 20900 | 17.3 | U | 28.5 | R | 27.9 | R | 15.9 | R | 12.4 | U | 16.4 | | 17.1 | |
| Methyl-tert-butyl ether | 3600 | 6.7 | U | 7.1 | R | 7.1 | R | 7 | R | 6.7 | U | 7.1 | U | 7.2 | U |
| n-Heptane | 13900 | 1.5 | U | 1.6 | R | 2.3 | R | 2.3 | R | 37.3 | | 5.7 | | 5.2 | U |
| n-Hexane | 24300 | 4.2 | U | 4.1 | R | 7 | R | 4.7 | R | 62.7 | U | 11.8 | U | 11.5 | U |
| n-Propylbenzene | 3480 | 4.6 | U | 7.9 | R | 5 | R | 4.8 | R | 8.6 | | 4.8 | U | 5 | U |
| o-Xylene | 34800 | 5.2 | | 9.6 | R | 7.4 | R | 5.3 | R | 19.6 | | 1.7 | U | 1.7 | U |
| Styrene | 34800 | 1.6 | UJ | 1.7 | R | 1.7 | R | 1.6 | R | 1.6 | UJ | 1.7 | UJ | 1.7 | UJ |
| Tetrachloroethene | 1390 | 1.3 | U | 1.3 | R | 1.3 | R | 1.3 | R | 1.3 | U | 1.3 | U | 1.5 | |
| Tetrahydrofuran | 69500 | 1.1 | U | 1.2 | R | 1.2 | R | 1.1 | R | 1.1 | U | 1.2 | U | 1.2 | U |
| Toluene | 174000 | 9.2 | | 4.9 | R | 6.5 | R | 4.3 | R | 79 | | 5.7 | | 4.8 | |

TABLE 2
MILFORD CONTAMINATED AQUIFER SITE
SOIL GAS ANALYTICAL RESULTS SUMMARY

| Analyte | EPA VISL (Residential Soil Gas) (ug/m ³) | RI-IIB-SG-04- 05-032719 | | RI-IIB-SG-05- 05-032719 | | RI-IIB-SG-06- 05-032719 | | RI-IIB-SG-07- 05-032719 | | RI-IIB-SG-08- 05-032719 | | RI-IIB-SG-09- 05-032719 | | RI-IIB-SG-09- 05-032719-A | |
|--|--|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|----------------------------|-----------|------------------------------|-----------|
| | | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier | Result | Qualifier |
| trans-1,2-Dichloroethene | NA | 1.5 | U | 1.6 | R | 1.6 | R | 1.5 | R | 1.5 | U | 1.6 | U | 1.6 | U |
| trans-1,3-Dichloropropene | NA | 1.7 | U | 1.8 | R | 1.8 | R | 1.8 | R | 1.7 | U | 1.8 | U | 1.8 | U |
| Trichloroethene | 69.5 | 1 | U | 1.1 | R | 1.1 | R | 1 | R | 1 | U | 1.1 | U | 1.1 | U |
| Trichlorofluoromethane | NA | 2.1 | U | 2.2 | R | 2.2 | R | 2.2 | R | 2.1 | U | 2.2 | U | 2.3 | U |
| Vinyl chloride | 55.9 | 0.48 | U | 0.5 | R | 0.5 | R | 0.49 | R | 3.1 | U | 0.5 | U | 0.51 | U |
| Other (ug/m³ unless otherwise noted) | | | | | | | | | | | | | | | |
| Helium | NA | 3.6 | U | 54% | | 43.20% | | 18.40% | | 3.6 | U | 3.6 | U | 3.6 | U |

Notes:

J = The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample.

J+=The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample and may be biased high.

J-= The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample and may be biased low.

R=The sample result is rejected as unusable due to serious deficiencies in one or more quality control criteria. The analyte may or may not be present.

U=The analyte was positively identified, but was not detected above the associated value (reporting limit).

UJ= The analyte was analyzed for, but was not detected above the reporting limit, considered approximate due to deficiencies in one of more quality control criteria.

ug/m³=micrograms per cubic meter

Results are compared to May 2019 EPA VISL for residential soil gas (cancer risk of 1E-05 and HQ of 1 for consistency with Ohio Environmental Protection Agency vapor intrusion guidance)